## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

\_\_\_\_\_

ETHICON NON-REVISION PTO 298 (ELECTION WAVE) CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## WITHDRAWAL OF NOTICE ADOPTION OF PRIOR DAUBERT REPLY OF DEBRA FROMER, M.D. FOR PTO 298 (ELECTION WAVE)

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert reply filed regarding Debra Fromer, M.D. for Ethicon Wave 8, to be filed by January 9, 2019, per Judge Goodwin's 12/21/2018, Order. (This Notice of Adoption will be amended with the correct docket number once the Wave 8 Reply is filed.) Plaintiffs respectfully request that the Court grant Plaintiffs' motion, for the reasons expressed in the Wave 8 briefing.

Dated: January 9, 2019 Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.
Bryan F. Aylstock, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)

E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL Wagstaff & Cartmell LLP 4740 Grand Avenue, Suite 300 Kansas City, MO 64112 816-701-1102 Fax 816-531-2372 tcartmell@wcllp.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 9, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett\_

D. RENEE BAGGETT Aylstock, Witkin, Kreis and Overholtz, PLC 17 E. Main Street, Suite 200 Pensacola, FL 32563 850-202-1010 850-916-7449 Rbaggett@awkolaw.com